

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-207 (NEB/LIB)

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

v.

(1) CHRISTOPHER DOUGLAS RICHARD,
(2) DOUGLAS EDWARD McCLENDON, and

21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 846
21 U.S.C. § 853

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy To Distribute Fentanyl and Other Controlled Substances)

Beginning in or around approximately March 2, 2021, and continuing through in or about March 12, 2021, the exact dates being unknown to the grand jury, in the State and District of Minnesota, the defendants,

**CHRISTOPHER DOUGLAS RICHARD,
DOUGLAS EDWARD McCLENDON, and**

,

did unlawfully, knowingly, and intentionally conspire with each other and others known and unknown to the grand jury, to possess with intent to distribute, and to distribute 40 grams or more of a mixture of a substance containing a detectable amount of fentanyl, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, a controlled substance, and other controlled substances, to include quantities of mixtures and substances containing a

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detectable amount of methamphetamine, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846.

COUNT 2

(Possession with Intent To Distribute Fentanyl and Other Controlled Substances)

On or about March 12, 2021, the exact dates being unknown to the grand jury, in the State and District of Minnesota, the defendant,

CHRISTOPHER DOUGLAS RICHARD,

did unlawfully, knowingly, and intentionally possess with intent to distribute 40 grams or more of a mixture of a substance containing a detectable amount of fentanyl, N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide, a controlled substance, and other controlled substances, to include quantities of mixtures and substances containing a detectable amount of methamphetamine, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

FORFEITURE ALLEGATIONS

Counts 1 and 2 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

If convicted of the Count 1 in this Indictment, the defendants,

**CHRISTOPHER DOUGLAS RICHARD,
DOUGLAS EDWARD McCLENDON, and**

,

shall forfeit to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all

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property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

If convicted of the Count 2 in this Indictment, the defendant,

CHRISTOPHER DOUGLAS RICHARD,

shall forfeit to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON